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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 SEATTLE DIVISION

11 FIRS HOME OWNERS ASSOCIATION,

12 Plaintiff,

13 v.

14 CITY OF SEATAC, a Municipal  
Corporation,

15 Defendant.

No. 2:19-cv-01130-RSL

DECLARATION OF VICENTE  
OMAR BARRAZA IN SUPPORT OF  
MOTION TO EXTEND TIME

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17 I, Vicente Omar Barraza, declare as follows:

18 I am one of the attorneys for the Firs Home Owners Association (the "Association"). I  
19 have personal knowledge of the facts as stated herein and if called upon to testify to the truth  
20 thereof, I could and would do so.

21 The original complaint, filed in State court, deliberately omitted federal causes of action  
22 in reliance on the City's assertions that the City was not receiving any direct or indirect federal  
23 financial assistance. Indeed, the City of SeaTac submitted Supplemental Briefing submitted to  
24 the Hearing Examiner (which became part of the record in *Medina, et. al, v; City of SeaTac, et.*  
25 *al*, King County Superior Court case number 17-2-07094-7 KNT) claiming: "The City is not  
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1 subject to the Limited English Proficiency (LEP) requirement under Title VI because the City is  
2 not receiving any direct or indirect Federal Financial Assistance.” *See* Dkt 22-1.

3 On September 6, 2019, the King County Department of Community and Human  
4 Services provided documents responsive to a public information request which indicated that  
5 the City of SeaTac received federal funds. The information from the King County Department  
6 of Community and Human Services has been incorporated into federal claims we pleaded in  
7 the proposed amended complaint included as an exhibit to the Motion to Amend filed on  
8 October 14, 2019. *See* Dkt 22-2.

9 The City of SeaTac served discovery on the Plaintiff on September 26, 2019, the same  
10 day that it filed its motion to dismiss.

11 I declare under penalty of perjury under the laws of the State of Washington and the  
12 United States that the foregoing is true and correct to the best of my knowledge.

13 Executed this 17th day of October 2019 at Seattle, Washington.  
14

15 /s/ V. Omar Barraza

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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*Attorneys for Defendant  
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DATED October 17, 2019, at Seattle, Washington.

s/ Vicente Omar Barraza  
Vicente Omar Barraza, WSBA #43589